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**Sent:** 9/11/2017 8:58:37 PM  
**To:** d'Almeida, Carolyn K. [dAlmeida.Carolyn@epa.gov]  
**CC:** steve [steve@uxopro.com]  
**Subject:** 2017-9-11 - WAFB - ADWR is being kept in the dispute info loop -

FYI – Dan Pope and Steve Willis inquired as to if Arizona Department of Water Resources (ADWR) was being kept in the info loop about former Williams Air Force Base (WAFB) dispute status. Until I have a closer-to-finished product, I have not solicited ADWR comments. However, I sent an update to David Christiana (ADWR) on Sept. 11, 2017:

#### **Site ST012**

- (1) Site ST012 (former fuel depot tank farm) may be elevated to Formal dispute due to enhanced bioremediation (EBR) remedy implementation (and subsequent transition to groundwater monitored natural attenuation [MNA]). EPA and ADEQ upper management would rather avoid a Formal dispute, but project staff, technical subject matter experts, and legal support are preparing a dispute-invoking letter if EPA, ADEQ, and USAF management cannot informally resolve issues. The following is draft language outlining the dispute nature (draft text):

##### ***A. Nature of the Dispute***

*This dispute centers on the transition at OU2 from Steam Enhanced Extraction (SEE) to a second phase of remediation, Enhanced Bioremediation (EBR). The AF's Revised Addendum #2 sets out a work plan for EBR implementation at OU2. The Regulatory Agencies' position is that this work plan fails to: (1) adequately characterize the Site, including the extent of benzene contamination and the remaining volume of LNAPL in the groundwater; (2) demonstrate that EBR implementation as planned will achieve remedial goals by the timeframe set forth in the Final Record of Decision Amendment 2 (RODA 2), Groundwater, Operable Unit 2, September 9, 2013; (3) set forth a monitoring plan and remedy success criteria necessary to evaluate the success of the remedy following implementation; and (4) adequately ensure that the plume of contaminated groundwater is controlled and that downstream drinking water sources are protected.*

I will keep ADWR apprised if this moves to Formal Dispute. Invoking (if it goes that far) could occur around Sept. 22, 2017.

#### **Site SS017**

- (2) No major change at Site SS017 (former pesticide and paint building, groundwater supply well, and water tower site). The dispute solution framework still in place. For all intents and purposes the dispute is over.....but technically the dispute is not resolved until all the boxes have been crossed off.....
- (A) a "revised" Record of Decision is being reviewed by ADEQ and EPA. EPA, ADEQ, and USAF still have to agree to language, sign and record;
  - (B) a Declaration of Environmental Use Restriction (DEUR) needs to be produced, agreed upon, signed, and recorded to the deed;
  - (C) ADEQ's Voluntary Remediation Program reviewed a USAF Work Plan and returned to USAF. The ADEQ VRP will review USAF lead impacted soil remediation work (after remediation completion), and will ultimately need to provide the US Air Force with a certificate that lead-based paint in soil has been remediated.

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